

Exhibit C

Plaintiff's State Court Discovery Responses

CAUSE NO. 2017-39729

M.A.,	§	IN THE DISTRICT COURT
Plaintiff,	§	
	§	
	§	
v.	§	HARRIS COUNTY, TEXAS
	§	
KFC CORPORATION, YUM! BRANDS, INC.,	§	
SHAWN BAKER, et al.,	§	
Defendants	§	80th JUDICIAL DISTRICT

**PLAINTIFF'S OBJECTIONS & ANSWERS TO DEFENDANT KFC CORPORATION'S
FIRST SET OF INTERROGATORIES**

TO: Defendant by and through its counsel, Hunter Johnson, CONSTANGY, BROOKS, SMITH & PROPHETE, LLP, 1201 Elm Street, Suite 2550, Dallas, TX 75270,

Plaintiff M.A., in the above-numbered and entitled cause, in accordance with TEX. R. CIV. P. 197, serves these Objections & Answers to Defendant KFC CORPORATION'S First Set of Interrogatories.

Respectfully submitted,

THE ZWERNEMANN LAW FIRM



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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing, Plaintiff's Objections & Answers to Defendant's KFC CORPORATION'S First Set of Interrogatories, have been forwarded in the manner indicated below on the 13th day of October, 2017.

Via e-File & E-mail: hjohnson@constangy.com

CONSTANGY, BROOKS, SMITH & PROPHETE, LLP

Hunter Johnson

1201 Elm Street, Suite 2550

Dallas, TX 75270

ATTORNEY FOR DEFENDANT



ALLEN H. ZWERNEMANN

INTERROGATORIES

INTERROGATORY 1.

State your full name and all aliases or other names you use, have used or gone by in the past.

ANSWER: Angela "Angie" Chantel Renee Moody

INTERROGATORY 2.

State your current residential address and all addresses you have resided since you were born, including but not limited to 517 Palisade Avenue, Jersey City, New Jersey and 181 Tompkins Avenue, Brooklyn, New York, and state the dates you lived at all addresses identified.

ANSWER: I do not consider where I currently stay as my "residential address" or even permanent address. It is my intention to return to the Houston, Texas area permanently with my baby to be reunited with his father, Sam, a man to whom I've been engaged. The only viable source of help in my family with raising my two-year-old baby right now is my mother and so I'm visiting her until the baby is a little older.

March 18, 1997 to 2000: 219-26 102ND Avenue, Queens, New York 11426

2000 to 2001 Bronx, New York

2001 to 2002: Upstate New York

2002: Manahatan, New York

2002 -2006: 181 Tompkins Avenue, Brooklyn, New York

August 2006- December 2006: Manhattan, NY

December 2006- December 2012: 17 Palisade Avenue, Jersey City, New Jersey

December 2012- April 2015: 4516 Donalbain Drive, Spring, Texas 77313

May 2015- June 2015: 2310 Springbriar Court, Spring, Texas 773123

June 2015- August 2015: Spring, Texas

August 27, 2015 to December 16, 2015: Trinity, Texas 75862

December 2015 to Present: 517 Palisade Avenue, Jersey City, New Jersey

INTERROGATORY 3.

Identify by name and provide the address and dates of attendance for each school you have attended through the date of your response, including grades Kindergarten through 12th Grade.

ANSWER: K- 2ndgrade: PS 163, Manhattan, NY
3rd grade: PS 304 Brooklyn, NY
4th grade: PS 163 and PS 28 Jersey City, NJ
5th grade-8th grade: PS 28 Jersey City, NJ
9th grade: William, L. Dickinson High School, 2 Palisade Ave, Jersey City, NJ 07306
9th grade: Dekaney High School
9th grade: Nimintz Ninth Grade School
10th grade: Nimintz High School
11th grade: Spring High School, 19428 I-45, Spring, Texas 77373
12th grade: William, L. Dickinson High School, 2 Palisade Ave, Jersey City, NJ 07306

INTERROGATORY 4.

Have you ever been married? If so, please identify the name, address and phone number of your spouse(s), the time period(s) you were married, and the addresses where you lived while married.

ANSWER: Not married, but engaged to Sam, the father of my son, who lives in the Houston, Texas area.

INTERROGATORY 5.

Identify and state your landline telephone number, cell phone number, the providers of your landline and cellular telephone services in the last ten (10) years, and the mailing address(es) they maintain on file and/or to which their billing statements are

sent.

ANSWER: April 2016 to present; Cell Phone; Straight Talk; (973) 568-4576; 517 November 2015 to April 2016; Cell Phone; Verizon: (936) xxx-xxxx; Trinity, Texas
November 2014 to November 2015; Cell Phone; Boost Mobile (832) xxx-xxxx; Spring, Texas.
November 2012 to November 2014; Cell Phone; T-Mobile; (201)xxx-xxxx; 517 Palisade Avenue, Jersey City, New Jersey (under mother's name)

INTERROGATORY 6.

Identify the name of all utility providers to you and/or the residence where you reside or have resided in the last ten (10) years, including any cable, internet, electric, or water company, and the mailing address(es) they maintain on file and/or to which their billing statements are sent.

ANSWER: I do not consider where I currently stay as my "residential address" or even permanent address. It is my intention to return to the Houston, Texas area permanently with my baby to be reunited with his father, Sam, a man to whom I've been engaged. The only viable source of help in my family with raising my two-year-old baby right now is my mother and so I'm visiting her until the baby is a little older.

Water Bill; 4516 Donalbain Drive, Spring, Texas 77313

INTERROGATORY 7.

Identify the name of any banking or other financial institution with which you have transacted business such as maintained a checking or savings account in the last ten (10) years, and state the mailing address(es) the banking or other financial institution maintain on file and/or list as your mailing address.

ANSWER: Chase Bank: 4516 Donalbain, Spring, Texas 77313
Bank of America: 4516 Donalbain Drive, Spring, Texas 77313

INTERROGATORY 8.

Identify the name of all credit card or other lending company that has extended credit to you in the last ten (10) years, and the mailing address(es) they maintain on file and/or to which their billing statements are sent.

ANSWER: None.

INTERROGATORY 9.

Identify the name of all your insurers, including health, life, disability and property insurers in the last ten (10) years, and the mailing address(es) they maintain on file and/or to which their billing statements are sent.

OBJECTION: Not relevant.

ANSWER: I do not consider where I currently stay as a permanent "mailing address" or even permanent address. It is my intention to return to the Houston, Texas area permanently with my baby to be reunited with his father, Sam, a man to whom I've been engaged. The only viable source of help in my family with raising my two-year-old baby right now is my mother and so I'm visiting her until the baby is a little older.

Health Insurance: December 2015 to Present; Horizon Blue Cross/Blueshield; 517 Palisade Avenue, Jersey City, New Jersey

Health Insurance: April 2015 to December 2015; Medicaid-Texas Health Benefit; 2310 Springbriar Court, Spring, Texas 77373

Health Insurance: 2013 to April 2015; Father's employee's insurance plan; 516 Donalbain Drive, Spring, Texas 77313

INTERROGATORY 10.

Identify the name of any governmental agency from whom you and/or your child receive any health or welfare benefits in the last ten (10) years, and the address the

agency maintains on file and uses as your mailing address.

OBJECTION: Not relevant.

INTERROGATORY 11.

Identify the name and address of any healthcare provider to you or your child in the last ten (10) years, including physicians, pediatricians, dentists, eye doctors.

OBJECTION: Not relevant as to "or your child".

**ANSWER: Dr. Craig Sorkin, Physician- 324 Palisade Avenue, Jersey City, NJ
Dr. Baines, Dentist - 386 Central Avenue, Jersey City, NJ 07307
Dr. Jennifer Nguyen, OBGYN- 19740 I-45, Spring, TX 77373
Dentist located in Houston on FM 1960**

INTERROGATORY 12.

Identify the name and address of any caregiver, day care, mother's day out, or school for your child from March 2016 through the present.

ANSWER: None.

INTERROGATORY 13.

Please state the full name, address, telephone number, and date of birth of the father of your child.

ANSWER: Samuel Allen Lee; 113 N. Clegg St #4, Trinity, Texas 75862; June 21, 1996.

INTERROGATORY 14.

Identify all employers with whom you have been employed from 2014 to the present other than KFC Corporation, including dates of employment, job title, and the

reason(s) why each such employment ended.

ANSWER: April 2017 to June 2017, Charlotte Russe, Sales Associates, School

INTERROGATORY 15.

State the name and address of each potential employer, entity or person to whom you have made application for employment since your employment with Defendant ended and include in your answer the date of each such application, the position for which application was made, the date of any interviews, and whether a job offer was extended.

OBJECTION: Not relevant.

INTERROGATORY 16.

State whether you have ever been charged or convicted of any crime(s), received an alternative adjudication, or served as a witness in any criminal proceeding. If so, state the location, the court, the style and cause number, the charged crime(s), the circumstances surrounding the charged crime(s), and the date of the conviction, alternative adjudication, or criminal proceeding in which you served as a witness and/or a defendant.

OBJECTION: Not relevant; not reasonably calculated to lead to the discovery of admissible evidence.

ANSWER: I have not been charged or convicted of a crime involving moral turpitude within the past ten years.

INTERROGATORY 17.

If, in the last five (5) years, Plaintiff has filed for unemployment, disability, or any other type of financial assistance from a federal or state agency, or health or welfare benefit provider, please identify the date of application, the name, address, and phone number of the entity or agency applied with, describe the type of assistance applied for, the claim number, and describe the outcome of such filing, including but

not limited to the amount of unemployment or other financial assistance received.

ANSWER: Not relevant; fishing expedition, outside scope, not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY 18.

Identify each state and federal administrative proceeding Plaintiff has been a party and/or Plaintiff (e.g., Equal Employment Opportunity Commission, Texas Workforce Commission, Department of Labor, National Labor Relations Board, workers' compensation, unemployment, Medicare, Medicaid, Texas Department of Human Services, bankruptcy, or social security claim). In identifying the proceeding, include a description of the style of the proceeding, the case and/or claim number, the name, address, and telephone number of the administration body, the date of filing of each claim, and the outcome of same.

ANSWER: None.

INTERROGATORY 19.

State whether you have a child and, if so, the name of your child, whether your child resides with you, and provide the address of the residence.

OBJECTION: Not relevant and object as to definition of reside or residence as permanent in nature.

ANSWER: Aiden Allen Lee stays with me, 517 Palisade Avenue, Jersey City, New Jersey.

INTERROGATORY 20.

State whether you attend church or other religious institution and, if so, provide the name, address and telephone number of the church or institution.

ANSWER: Yes. Fallbrook, 12512 Walters Road, Houston, TX 77014 (281) 444-2733

**Trinity Pines Baptist Church, 4769 FM 356 Trinity, Texas 75862 (936)
594-5277**

INTERROGATORY 21.

State whether you belong to any unions, groups, societies, or organizations, and provide the name, address and telephone number of each.

ANSWER: None.

INTERROGATORY 22.

Provide all email addresses and social media (i.e. Facebook, Snachat, and Instagram) screen names and/or handles used by you since January 2014. With regard to each email address, please provide the name and address of the service provider who provided you with said email address.

OBJECTION: Not relevant.

INTERROGATORY 23.

If you contend you reported or complained of any alleged wrongful acts described in your Petition to Defendants or their agents, then:

- a. identify each person to whom Plaintiff reported or complained;
- b. describe the date, time, and manner of the complaint;
- c. describe the substance of the complaint; and
- d. describe any response to Plaintiff's complaint by the person to whom you complained or Defendants.

**ANSWER: a. Sean McIntosh
 b. July 2014, Night Shift**

c. Complained that Neely attempted rape me in the bathroom. Neely pulled down his pants and tried to pull down my pants. Asked him to call the cops

d. Response – Did not have much of a reaction, was listening to his music. Called the cops then told me to finish cleaning then I could go home.

a. Sean McIntosh

b. Summer 2014, Night Shift

c. Complained that Anthony Jones exposed himself to you

d. Response – Oh just relax, don't worry about, Anthony likes you. McIntosh said that Jones and I would be cute couple

a. City of Houston Police Department

b. July 2014

c. Complained that Neely attempted rape me in the bathroom. Neely pulled down his pants and tried to pull down my pants. Asked him to call the cops

d. No response

a. City of Houston Police Department – Officer McCloud

b. November 2016

c. Discussed the attempted rape by Neely and the exposure and other offensive measure of Jones. Discussed the overall harassing and sexual environment of the existed at the store.

d. No response

INTERROGATORY 24.

Identify the name, address and telephone number of all health care providers (by way of example, doctor, hospital, therapist, physician, counselor, welfare worker, chiropractor, nurse, clinic, psychiatrist, psychologist, social worker, licensed professional counselor, qualified mental health professional) from whom you have sought advice, counseling, treatment, diagnosis, or therapy based on or pertaining to your employment with Defendant or any alleged physical injury, emotional pain

and suffering, or mental anguish you claim to have suffered in this case. Please include your reason for seeking advice, counseling, treatment, diagnosis or therapy, and an address and telephone number for the medical provider(s).

ANSWER: None yet.

INTERROGATORY 25.

Identify all health care providers (by way of example, doctor, hospital, therapist, physician, social worker, welfare worker, chiropractor, nurse, clinic, psychiatrist, psychologist, social worker, licensed professional counselor, qualified mental health professional) from whom you have sought advice, counseling, treatment, diagnosis, or therapy from 2014 to the present for any reason. Please include your reason for seeking advice, counseling, treatment, diagnosis or therapy, and an address and telephone number for the medical provider(s).

ANSWER: Jennifer Nguyen in Houston.

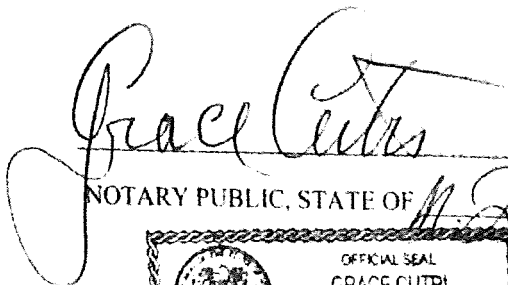
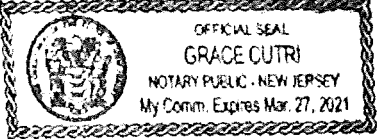
VERIFICATION:

STATE OF _____ §
COUNTY OF _____ § KNOW ALL MEN BY THESE PRESENTS
§

ON THIS DAY, ANGELA MOODY personally appeared before me, the undersigned Notary Public, and after being duly sworn, stated under oath that she is the "Plaintiff" in this cause; that she has read the foregoing "Plaintiff Response to Defendant Yum!Brands First Set of Interrogatories to Plaintiff", and that every statement contained therein is within her personal knowledge, and is true and correct; that all the allegations of the said Plaintiff Response to Defendant Yum!Brands First Set of Interrogatories to Plaintiff are true in substance and in fact, and that no such material fact or circumstance has, within the Plaintiff knowledge, has been omitted from such Plaintiff Response to Defendant Yum!Brands First Set of Interrogatories to Plaintiff


ANGELA MOODY

SUBSCRIBED, SWORN TO AND ACKNOWLEDGED BEFORE ME, the undersigned authority,
on this, the 10 day of October 2017.


NOTARY PUBLIC, STATE OF NJ


VERIFIED BY: [illegible]

DOCUMENT NO. D 386252

City of New York

Department of Health

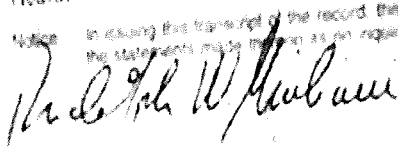
Vital Records

CERTIFICATE OF BIRTH REGISTRATION

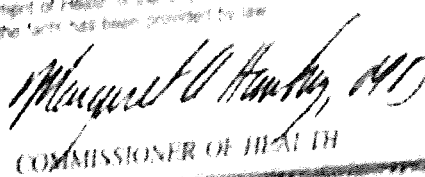
Below is an exact copy of a certificate of Birth registered for your child. It is sent without charge. If the certificate contains any errors, contact the Corrections Unit, Division of Vital Records, 125 Worth Street, New York, New York 10013. You will be advised how to have the record corrected. It is important to do this at once. DO NOT RETURN THE CERTIFICATE.

The reproduction or alteration of this transcript is prohibited by section 121 of the New York City Health Code.

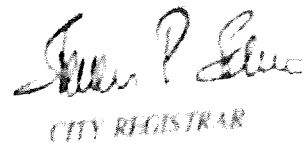
Notice: In issuing this transcript of the record, the Department of Health of the City of New York does not certify to the truth of the statements made therein as an inquiry as to the facts has been provided by law.



MAYOR



COMMISSIONER OF HEALTH



CITY REGISTRAR

CERTIFICATE OF BIRTH

156-97-020722

Birth No.

1. FULL NAME OF CHILD First Name: ANGELA Middle Name: CHANTEL RENEE Last Name: MOODY		2. SEX Female		3a. DATE OF BIRTH Month: REDACTED, Day: REDACTED, Year: 1997		3b. HOUR 03:02 AM	
4. PLACE OF BIRTH a. NEW YORK CITY b. BOROUGH OF: Queens		5. Name of Facility (if not in institution street address): JAMAICA HOSPITAL		6. TYPE OF PLACE: Hospital			
7. MOTHER'S FULL MAIDEN NAME: ATHENA LEA MOODY		8. MOTHER'S DATE OF BIRTH: REDACT 1973		9. MOTHER'S BIRTHPLACE: New York, NY			
10. MOTHER'S USUAL RESIDENCE a. State: NY, b. County: Queens		11. City, town or location: QUEENS VILLAGE		12. Street and house number: 219-26 102ND Avenue		13. Zip: 11429	
14. FATHER'S FULL NAME: [illegible]		15. FATHER'S DATE OF BIRTH: [illegible]		16. FATHER'S BIRTHPLACE: [illegible]			
17. NAME OF ATTENDANT AT DELIVERY: MARINA GUERRERO, M.D.		18. I CERTIFY THAT THIS CHILD WAS BORN ALIVE AT THE PLACE, DATE AND TIME GIVEN.					
19. Information added or amended (Reason):		20. Signed Name of Signer: VIOLETA BARTOLOME		21. Address: JAMAICA HOSPITAL, Jamaica, NY 11418			
22. Date: [illegible]		23. City Registrar: [illegible]		24. Date Signed: March 10, 1997			

VITAL RECORDS

DEPARTMENT OF HEALTH

THE CITY OF NEW YORK

ATHENA LEA MOODY
219-26 102ND Avenue
Queens Village NY 11429

MOTHER'S MAILING ADDRESS

Copy of this certificate will be mailed to her when it is filed with the Department of Health.


M.A. --00001

NEW JERSEY Motor Vehicle Commission

FOR IDENTIFICATION ONLY

REDACTED

ID


Chief Administrator

CLASS I



REDACTED

DOB

1997

ISS

02-01-2016

EXP

02-29-2020

Angela Marie

RESTP NONE

MC
AN

517 PALISADE AVE.
JERSEY CITY, NJ 07307

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M.A. --00002